



January 31, 2003

VIA UPS OVERNIGHT MAIL

Mr. Richard Winfield
Emergency and Remedial Response Division
U. S. Environmental Protection Agency
290 Broadway
New York, New York 10007

Re: Request for Information, Passaic River Study Area – Diamond Alkali Superfund Site, Kleer
Kast Division of PMC, Inc.

Dear Mr. Winfield:

This is in response to your letter dated November 25, 2002 regarding the above referenced matter. As indicated in the initial request for information dated December 24, 1996, the USEPA is "...investigating the presence of hazardous substances in the sediments of the Passaic River." In conversations with Kedari Reddy regarding this matter, USEPA suspects that there is a connection between our property (located at 450 Schuyler Ave., Kearny, NJ) and the Passaic River via a stream called Frank's Creek.

Our investigation of your information request and the site's connection to Frank's Creek has yielded the following information. Frank's Creek, or at least the piped remnants of the creek, do enter the Passaic River as stated in your letter of 11/25/2002. We have determined, however, that no flow or run-off from the property at 450 Schuyler Ave. (referenced as Kleer Kast Division of PCM, Inc.) can reach Frank's Creek. In fact, all flow from the site (other than the sanitary sewer with discharge to the local POTW) enters the Kearny Freshwater Marsh which ultimately flows to the Hackensack River. The following information is provided to document these findings.

The property at 450 Schuyler Avenue is shown on the Tax Map, Town of Kearny, sheet 42 (see Exhibit 1). The highlights show the site consists of block 202, lots 3 & 4 and block 226, lot 11. The eastern property line abuts the Erie-Lackawana Railroad right-of-way which runs north-south through the area.

The presence and course of Frank's Creek in the area are documented in a Town of Kearny Tax Map, M2 (see Exhibit 2). A topographic map of the area, State of New Jersey, Hackensack Meadowlands Development Commission, Sheet 24 (see Exhibit 3) covers a wide area including Frank's Creek and our site (highlighted on Exhibit 3). This map clearly shows where Frank's Creek connects to a concrete lined drainage channel as you follow it up stream (west) and under the elevated railroad bed (Erie-Lackawana Railroad) cutting across the area roughly north-south. The southeastern corner of our site is located to the north of Frank's Creek at a distance of roughly 1,800 feet.

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The topo shows elevations on our site and to the south that prevent flow from the site entering into the creek. Water from the site would have to flow up hill to the south to reach Frank's Creek. Field observations, former employee interviews and the topos show that all flow from the site leaves ponds on our property and then flows north along the west side of the elevated railroad bed. The flow then goes under the railroad bed at a pipe in the southeast corner of the Kearny Playground and connects to the Kearny Freshwater Marsh. Hackensack Meadowlands Commission owns the Kearny Freshwater Marsh and informed us that any flow from the marsh would ultimately enter the Hackensack River. None of that water enters the Passaic River.

The clearest picture of the flow patterns in the Kearny Freshwater Marsh and Frank's Creek area are provided on a map from General Plan Application, SU-3 Kearny Meadows, Jan., 1982; Exhibit 6 Existing Topographic Conditions and Drainage - Kearny Meadows (see Exhibit 4). Note that the heavy dashed line shows that our property (note the pond, highlighted, on the drawing near the west origin of the dashed line) is clearly on the north side of the drainage divide which flows to the Hackensack.

No water flow from the site at 450 Schuyler Ave. can reach Frank's Creek or the Passaic River. Therefore, we believe that this information is fully responsive to your information request. If you have any questions on this matter, please contact me at the letterhead address or at 513-482-7355.

Sincerely,



Mark Miller, Director
Regulatory Affairs

Enclosures (4)

cc: Kedari Reddy (U.S. EPA) (VIA UPS OVERNIGHT MAIL)

P. E. Kamins (w/o encl.)
G. E. Kamins (w/o encl.)
L. M. Johnson (w/o encl.)
T. C. Cheong (w/o encl.)
F. L. Engen (w/encl.)